

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

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21 MC 102 (AKH)

JOSE NICOLA,

07-CV-5372 (AKH)

Plaintiff,

-against-

**NOTICE OF ADOPTION BY  
BLUE MILLENNIUM  
REALTY LLC OF ANSWER  
TO MASTER COMPLAINT**

80 LAFAYETTE ASSOCIATES LLC, ET AL.,

Defendants.

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**PLEASE TAKE NOTICE** that defendant **BLUE MILLENNIUM REALTY LLC** (hereinafter "Blue Millennium"), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Blue Millennium's Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

**WHEREFORE**, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 11, 2007

**HARRIS BEACH PLLC**  
*Attorneys for Defendant*  
**BLUE MILLENNIUM REALTY LLC**

/s/  
\_\_\_\_\_  
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***Liaison Counsel for the Defendants***

All Other Defense Counsel

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on September 11, 2007, I caused the following document to be electronically via the Court's ECF system:

1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

The undersigned further certifies that on September 11, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

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***Liaison Counsel for the Defendants***

Dated: September 11, 2007

\_\_\_\_\_  
/s/  
Stanley Goos, Esq. (SG 7062)